

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**TANNER S. ADAM, JONATHAN L.  
ADAM, TRITEN FINANCIAL GROUP,  
LLC, and GCZ GLOBAL LLC,**

**Defendants, and**

**AVA A. ADAM, GARRETT L.W. ADAM,  
ROBERT S. ADAM, CARRIE L. ADAM,  
EMILIO F. HINOJOSA, AND VIRGINIA  
I. HINOJOSA,**

**Relief Defendants.**

**Civil Action File No.  
1:24-cv-03774-MHC**

**JURY DEMAND**

**PLAINTIFF'S APPLICATION FOR  
ENTRY OF DEFAULT AGAINST THE RELIEF DEFENDANTS**

Plaintiff, the Securities and Exchange Commission ("Commission"), hereby applies to the Clerk of the Court pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for an entry of default against relief defendants Ava A. Adam, Garrett L.W. Adam, Robert S. Adam, Carrie L. Adam, Emilio F. Hinojosa, and

Virginia I. Hinojosa (collectively, the “Relief Defendants”). Entry of default is sought against the Relief Defendants for failure to plead or otherwise defend as provided by Rule 55(a). In support of this application for entry of default against the Relief Defendants, Plaintiff states that it has filed a Return of Service for each relief defendant executed by the process server who served each relief defendant with the Complaint and Summons on April 28, 2025. Each Return of Service of process was filed with this Court on May 5, 2025 [Dkt. Nos. 22-27] and is now part of the record in this case.

The Relief Defendants were obligated to file an answer to the Complaint no later than May 19, 2025, but no relief defendant has filed an Answer as required by the federal rules. Since the Relief Defendants have not timely filed a response to the Complaint, the entry of default is now appropriate.

Under Rule 55(a) of the Federal Rules of Civil Procedure, the Clerk of Court is instructed to enter a default against a defendant who “has failed to plead or otherwise defend,” when a failure to defend is shown by affidavit or otherwise. Indeed, the purpose of Rule 55(a) is to relieve the district judge of the obligation of reviewing applications for the entry of default. 6 James W. Moore et al. Moore’s Federal Practice ¶ 55.03[1] n.16 (2d ed. 1992). Thus, the power to enter default is given to the Clerk. Based therefore on the previously filed Return of Service establishing that the Relief Defendants were served on April 28, 2025, and the

authority specifically granted to the Clerk by Rule 55(a), the Commission respectfully requests the Clerk enter a default against the Relief Defendants forthwith.

Respectfully submitted this 26th day of September 2025,

/s/ Kristin W. Murnahan

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COUNSEL FOR PLAINTIFF

**CERTIFICATE OF SERVICE**

I hereby certify that I electronically filed the foregoing with the Clerk of this Court using the CM/ECF system which will send notice of such filing to counsel of record.

I also certify that I sent the foregoing filing via UPS to the following:

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Dated: September 26, 2025

/s/ Kristin W. Murnahan  
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